

# Georgia Department of Natural Resources

## Environmental Protection Division – Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054, Atlanta, Georgia 30334

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Richard E. Dunn, Director

July 11, 2016

### VIA EMAIL AND REGULAR MAIL

Mr. Michael J. Putman  
Diamond Crystal Duluth, LLC  
3245 North Berkley Lake Road  
Duluth, GA 30096

Re: Comments: Semi-Annual VRP Progress Report #2  
Diamond Crystal Duluth Property  
North Berkeley Lake Road Site  
Duluth, Gwinnett County, HSI # 10844

Dear Mr. Putman:

The Environmental Protection Division (EPD) is in receipt of the June 17, 2016, VRP Progress Report (Report #2 for the Diamond Crystal Duluth Property, in Duluth, Gwinnett County. After completing a review of this report, EPD has prepared the following comments:

- 1) The receptor-specific health-based goals for arsenic in soil are acceptable. However, Section 2.1.3 states, "No development of RRS for the protection of groundwater will be completed at this time, pending results of the groundwater assessment." Please note that unless the proposed RRS is being based on the generic Type 1 or Type 3 soil RRS, the leachability requirement must be met prior to approval of the overall site-specific soil RRS for the site [see section 391-3-19-.07(9)(d)1 of the Rules for Hazardous Site Response]. An evaluation of the leachability pathway is an essential component in the determination of any site-specific soil RRS.

The above listed comment must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide a response to the above listed comment as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Mark Taylor, SynTerra Corporation <mtaylor@synterracorp.com>

File: HSI # 10844

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